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10 *Attorneys for Fire Victim Trustee*

11
12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**
15

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC**
20 **COMPANY,**

21 **Debtors.**

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

22
23 **NOTICE OF SUBPOENAS**

24 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

25 PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 45, as incorporated through Rule
26 9016 of the Federal Rules of Bankruptcy Procedure, PG&E Fire Victim Trustee, by and through its
27 undersigned counsel, hereby gives notice that document subpoenas will be served on the entities
28 identified below pursuant to this Court's Second Order on Ex Parte Request for Rule 2004

1 Subpoenas and Setting Hearing, signed and filed November 23, 2020 (Dkt. 9594). Copies of the
2 subpoenas are attached hereto as follows:

- 3 • **Exhibit A** – Occidental Fire and Casualty Company of North Carolina
- 4 • **Exhibit B** – Titan Insurance Company
- 5 • **Exhibit C** – Hamilton Managing General Agency Americas LLC
- 6 • **Exhibit D** – Freedom Specialty Insurance Company
- 7
- 8

9 DATED: December 4, 2020

BROWN RUDNICK LLP

11 By: /s/ JOEL S. MILIBAND

Joel S. Miliband (SBN 077438)
2211 Michelson Drive, Seventh Floor
Irvine, California 92612
Telephone: (949) 752-7100

14 And

16 BROWN RUDNICK LLP
David J. Molton (SBN 262075)
Seven Times Square
New York, New York 10036
Telephone: (212) 209-4800

19 *Counsel for Fire Victim Trustee*

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CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2020, the foregoing was been served upon all parties or their attorneys in a manner authorized by Federal Rule of Civil Procedure 5(b)(1).

/s/ JOEL S. MILIBAND
Joel S. Miliband

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EXHIBIT A

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**PACIFIC GAS AND ELECTRIC
COMPANY,**

Chapter 11
(Lead Case)
(Jointly Administered)

(Name of person to whom this subpoena is directed)

Place:
Capital Reporting Inc.
8320 Falls of the Neuse Road, Suite 101
Raleigh, NC 27615

Date and Time:
December 23, 2020 at 9am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached — Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: December 4, 2020 *CLERK OF COURT*

OR

Signature of Clerk or Deputy Clerk

/s/Joel S. Miliband

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing the PG&E Fire Victim Trustee, who issues or requests this subpoena, are:

Joel S. Miliband, Brown Rudnick LLP, 2211 Michelson Drive, Seventh Floor, Irvine, California 92612,
JMiliband@brownrudnick.com

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Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Bankruptcy Case
No. 19-30088 (DM)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (*name of individual and title, if any*) _____

on (*date*) _____.

☐ I served the subpoena by delivering a copy to the name person as follows: _____

_____ on (*date*) _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) **For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) **For Other Discovery.** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) **Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) **Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) **Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) **When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) **When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) **Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information.

These procedures apply to producing documents or electronically stored information:

(A) **Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified.

If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) **Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

(D) **Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) **Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) **Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

1 **EXHIBIT 1**

2 **DEFINITIONS**

3 1. The term “**Bankruptcy Court**” shall mean the United States Bankruptcy Court for
4 the Northern District of California.

5 2. The term “**Chapter 11 Cases**” shall mean the chapter 11 cases commenced by
6 PG&E Corporation and Pacific Gas and Electric Company in the Bankruptcy Court, Case
7 No. 19-30088.

8 3. The term “**Chapter 11 Plan**” shall mean the Debtors’ and Shareholder Proponents’
9 Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket No. 8048] confirmed by
10 order of the Bankruptcy Court in the Chapter 11 Cases.

11 4. The term “**Claim Files**” shall mean claim files containing information relating to
12 insurance coverage, policy limits, insurance claims, reserves, and insurance payments, including,
13 but not limited to, insurance policies, statements of loss, and policy declarations.

14 5. The term “**Claim-Related Documents**” means all documents that relate to the
15 evaluation of damages, including, but not limited to, repair and replacement estimates and bids,
16 appraisals, scopes of loss, drawings, plans, reports, third-party findings on the amount of loss,
17 covered damages, and cost of repairs, and all other valuation, measurement, and loss adjustment
18 calculations of the amount of loss, covered damage, and cost of repairs.

19 6. The term “**Communications**” shall mean all inquiries, discussions, conversations,
20 negotiations, agreements, understandings, meetings, telephone conversations, letters, notes,
21 telegrams, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal,
22 written, mechanical, or electronic disclosure, in Your actual or constructive control or custody or in
23 the control or custody of any current or former affiliates, representatives or advisors.

24 7. The term “**Documents**” shall mean any writings, recordings, electronic files and
25 mails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001
26 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents
27 and information in Your possession, custody, or control, and includes: all and any written,
28 recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda,

1 transcripts, tapes, or other voice recordings, and all other documents and tangible things, including
2 booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts,
3 agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files,
4 interoffice memoranda, or interoffice communications of any description, calculations, invoices,
5 accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails,
6 phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes,
7 letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and
8 all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document
9 was prepared in several copies, or if additional copies were thereafter made, and if any such copies
10 are not identical in all respects or are no longer identical by reason of subsequent notation or
11 modification of any kind whatsoever, including notes on the front or back, in the margins, or on
12 any of the pages thereof, then each such non-identical copy is a separate Document and must be
13 produced. When examples of categories or types of Documents are given in a particular Request
14 by use of phrases such as “including,” this shall always be interpreted as being for illustrative
15 purposes only (i.e., to be understood as “including without limitation”) and in no way limits or
16 narrows the scope of any Request. “Documents” always includes Communications, whether so
17 stated in a particular Request or not.

18 8. The term “**Fire Victim Trust**” shall have the same meaning as that term is used in
19 the Chapter 11 Plan.

20 9. The term “**Fires**” shall have the same meaning as that term is used in the Chapter 11
21 Plan.

22 10. The term “**Insured Fire Victim**” shall mean a person or entity covered by insurance
23 who suffered a loss arising from one of the Fires and filed a Proof of Claim in the Chapter 11 Cases
24 on or before December 31, 2019.

25 11. The term “**Subrogation Wildfire Claim**” shall have the same meaning as that term
26 is used in the Chapter 11 Plan.

27 12. The term “**You**” and/or “**Your**” means Occidental Fire and Casualty Company of
28 North Carolina.

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2. Produce all Documents and all other materials described below in Your actual or constructive possession, custody, or control, including in the possession, custody, or control of current or former employees, officers, directors, agents, agents' representatives, consultants, contractors, vendors, or any fiduciary or other third parties, wherever those Documents and materials are maintained, including on personal computers, PDAs, wireless devices, or web-based email systems such as Gmail, Yahoo, etc.

4. Produce the original or duplicate, as such terms are defined by Rule 1001 of the Federal Rules of Evidence, of each Document requested together with all non-identical copies and drafts of that Document. If a duplicate is produced, it should be legible and bound or stapled in the same manner as the original.

5. Documents not otherwise responsive to these Requests should be produced: (i) if such Documents mention, discuss, refer to, explain, or concern one or more Documents that are

1 called for by these Requests; (ii) if such Documents are attached to, enclosed with, or accompany
2 Documents called for by these Requests; or (iii) if such Documents constitute routing slips,
3 transmittal memoranda or letters, comments, evaluations, or similar materials.

4 6. Documents attached to each other should not be separated; separate Documents
5 should not be attached to each other.

6 7. Documents should include all exhibits, appendices, linked Documents, or otherwise
7 appended Documents that are referenced in, attached to, included with, or are a part of the
8 requested Documents.

9 8. If any Document, or any part thereof, is not produced based on a claim of attorney-
10 client privilege, work-product protection, or any other privilege, then in answer to such Request or
11 part thereof, for each such Document, You must:

- 12 a. Identify the type, title and subject matter of the Document;
- 13 b. State the place, date, and manner of preparation of the Document;
- 14 c. Identify all authors, addressees, and recipients of the Document, including
15 information about such persons to assess the privilege asserted; and
- 16 d. Identify the legal privilege(s) and the factual basis for the claim.

17 9. Documents should not contain redactions unless such redactions are made to protect
18 information subject to the attorney-client privilege and/or work-product doctrine. In the event any
19 Documents are produced with redactions, a log setting forth the information requested in
20 Instruction 8 above must be provided.

21 10. To the extent a Document sought herein was at one time, but is no longer, in Your
22 actual or constructive possession, custody, or control, state whether it: (i) is missing or lost; (ii) has
23 been destroyed; (iii) has been transferred to others; and/or (iv) has been otherwise disposed of. In
24 each instance, identify the Document, state the time period during which it was maintained, state
25 the circumstance and date surrounding authorization for such disposition, identify each person
26 having knowledge of the circumstances of the disposition, and identify each person who had
27 possession, custody, or control of the Document. Documents prepared prior to, but which relate or
28 refer to, the time period covered by these Requests are to be identified and produced.

1 11. Provide a privilege log relating to Your responses to each of these Requests which
2 You are withholding on the basis of privilege. The privilege log must list the Document or
3 information withheld and the legal basis for withholding that information.

4 12. Unless otherwise specified, the time period covered by these Requests for
5 Production is from September 9, 2015 to the present.

6 **MANNER OF PRODUCTION**

7 1. All Documents produced to the Fire Victim Trust shall be provided in either native
8 file (“native”) or single-page 300 dpi-resolution group IV TIF format (“tiff”) format as specified
9 below, along with appropriately formatted industry-standard database load files and accompanied
10 by true and correct copies or representations of unaltered attendant metadata. Where Documents
11 are produced in tiff format, each Document shall be produced along with a multi-page, Document-
12 level searchable text file (“searchable text”) as rendered by an industry-standard text extraction
13 program in the case of electronic originals, or by an industry-standard Optical Character
14 Recognition (“ocr”) program in the case of scanned paper Documents. Searchable text of
15 Documents shall not be produced as fielded data within the “.dat file” as described below.

16 2. Database Load Files and Production Media Structure: Database load files shall
17 consist of: (i) a comma-delimited values (“.dat”) file containing: production Document identifier
18 information, data designed to preserve “parent and child” relationships within Document
19 “families,” reasonably accessible and properly preserved metadata (or bibliographic coding in the
20 case of paper Documents), custodian or Document source information; and (ii) an Opticon (“.opt”)
21 file to facilitate the loading of tiff images. Load files should be provided in a root-level folder
22 named “Data,” images shall be provided within a root level “Images” folder containing reasonably
23 structured subfolders, and searchable text files shall be provided in a single root-level “Text”
24 folder.

25 3. Electronic Documents and Data, Generally: Documents and other responsive data
26 or materials created, stored, or displayed on electronic or electro-magnetic media shall be produced
27 in the order in which the Documents are or were stored in the ordinary course of business,
28 including all reasonably accessible metadata, custodian or Document source information, and

1 searchable text as to allow the Fire Victim Trust, through a reasonable and modest effort, to fairly,
2 accurately, and completely access, search, display, comprehend, and assess the Documents' true
3 and original content.

4 4. Emails and Attachments, and Other Email Account-Related Documents: All
5 Documents and accompanying metadata created and/or stored in the ordinary course of business
6 within commercial, off-the-shelf email systems including but not limited to Microsoft Exchange™,
7 Lotus Notes™, or Novell Groupwise™ shall be produced in tiff format, accompanying metadata,
8 and searchable text files or, alternately, in a format that fairly, accurately, and completely
9 represents each Document in such a manner as to make the Document(s) reasonably useable,
10 manageable, and comprehensible by the Fire Victim Trust.

11 5. Documents and Data Created or Stored in or by Structured Electronic Databases:
12 With the exclusion of email and email account-related Documents and data, all Documents and
13 accompanying metadata created and/or stored in structured electronic databases or files shall be
14 produced in a format that enables the Fire Victim Trust to reasonably manage and import those
15 Documents into a useable, coherent database. Documents must be accompanied by reasonably
16 detailed documentation explaining the Documents' content and format including but not limited to
17 data dictionaries and diagrams. Some acceptable formats, if and only if provided with definitive
18 file(s), table(s), and field level schemas include:

- 19 a. XML format file(s);
- 20 b. Microsoft SQL database(s);
- 21 c. Access database(s); and/or
- 22 d. fixed or variable length ASCII delimited files.

23 6. Spreadsheets, Multimedia, and Non-Standard File Types: All Documents generated
24 or stored in software such as Microsoft Excel or other commercially available spreadsheet
25 programs, as well as any multimedia files such as audio or video, shall be produced in their native
26 format, along with an accompanying placeholder image in tiff format indicating a native file has
27 been produced. A "Nativelink" entry shall be included in the .dat load file indicating the relative
28 file path to each native file on the production media. To the extent You have other file types that

1 do not readily or easily and accurately convert to tiff and searchable text, You may elect to produce
2 those files in native format subject to the other requirements listed herein. Native files may be
3 produced within a separate root-level folder structure on deliverable media entitled "Natives."

4 7. "Other" Electronic Documents: All other Documents and accompanying metadata
5 and embedded data created or stored in unstructured files generated by commercially available
6 software systems (excluding emails, structured electronic databases, spreadsheets, or multimedia)
7 such as, but not limited to, word processing files (such as Microsoft Word), image files (such as
8 Adobe .pdf files and other formats), and text files shall be produced in tiff and searchable text
9 format in the order the files are or were stored in the ordinary course of business.

10 8. Paper Documents: Documents originally created or stored on paper shall be
11 produced in tiff format. Relationships between Documents shall be identified within the Relativity
12 .dat file utilizing document identifier numbers to express parent Document/child attachment
13 boundaries, folder boundaries, and other groupings. In addition, the searchable text of each
14 Document shall be provided as a multi-page text file as provided for by these Requests for
15 Production.

16 DOCUMENT REQUESTS

17 **REQUEST NUMBER 1:**

18 Claim Files for all Insured Fire Victims.
19

20 **REQUEST NUMBER 2:**

21 Claim-Related Documents for all Insured Fire Victims.
22

23 **REQUEST NUMBER 3:**

24 Documents that record, reflect, or show payments made to Insured Fire Victims.
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26 **REQUEST NUMBER 4:**

27 Documents that record, reflect, or show reserves for future payments and policy limits for
28 Insured Fire Victims.

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EXHIBIT B

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 In re:

4 PG&E CORPORATION
5 -and-
6 PACIFIC GAS AND ELECTRIC
7 COMPANY,

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

8 SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
9 OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Titan Insurance Company, One Nationwide Plaza, Columbus OH 43212;
C/O Corporation Service Company, 8825 North 23rd Avenue, Suite 100, Phoenix AZ 85021

(Name of person to whom this subpoena is directed)

- 11 ☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: **See attached Exhibit 1.**

13 Place: Mike Mobley Reporting
14 200 E Campus View Boulevard Suite 200
15 Columbus, OH 43235

Date and Time:
December 23, 2020 at 9am

- 16 ☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

18 Place:

Date and Time:

20 The following provisions of Fed. R. Civ. P. 45 are attached — Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

22 Date: December 4, 2020 CLERK OF COURT

23 OR

24 _____
Signature of Clerk or Deputy Clerk

/s/Joel S. Miliband

Attorney's signature

25 The name, address, e-mail address, and telephone number of the attorney representing the PG&E Fire Victim Trustee, who issues or requests this subpoena, are:

26 Joel S. Miliband, Brown Rudnick LLP, 2211 Michelson Drive, Seventh Floor, Irvine, California 92612,
27 JMiliband@brownrudnick.com

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Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Bankruptcy Case
No. 19-30088 (DM)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (*name of individual and title, if any*) _____
on (*date*) _____.

☐ I served the subpoena by delivering a copy to the name person as follows: _____

_____ on (*date*) _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$_____.

My fees are \$_____ for travel and \$_____ for services, for a total of \$_____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

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These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified.

If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form.

The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

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(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

1 **EXHIBIT 1**

2 **DEFINITIONS**

3 1. The term “**Bankruptcy Court**” shall mean the United States Bankruptcy Court for
4 the Northern District of California.

5 2. The term “**Chapter 11 Cases**” shall mean the chapter 11 cases commenced by
6 PG&E Corporation and Pacific Gas and Electric Company in the Bankruptcy Court, Case
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9 Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket No. 8048] confirmed by
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12 insurance coverage, policy limits, insurance claims, reserves, and insurance payments, including,
13 but not limited to, insurance policies, statements of loss, and policy declarations.

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15 evaluation of damages, including, but not limited to, repair and replacement estimates and bids,
16 appraisals, scopes of loss, drawings, plans, reports, third-party findings on the amount of loss,
17 covered damages, and cost of repairs, and all other valuation, measurement, and loss adjustment
18 calculations of the amount of loss, covered damage, and cost of repairs.

19 6. The term “**Communications**” shall mean all inquiries, discussions, conversations,
20 negotiations, agreements, understandings, meetings, telephone conversations, letters, notes,
21 telegrams, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal,
22 written, mechanical, or electronic disclosure, in Your actual or constructive control or custody or in
23 the control or custody of any current or former affiliates, representatives or advisors.

24 7. The term “**Documents**” shall mean any writings, recordings, electronic files and
25 mails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001
26 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents
27 and information in Your possession, custody, or control, and includes: all and any written,
28 recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda,

1 transcripts, tapes, or other voice recordings, and all other documents and tangible things, including
2 booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts,
3 agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files,
4 interoffice memoranda, or interoffice communications of any description, calculations, invoices,
5 accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails,
6 phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes,
7 letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and
8 all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document
9 was prepared in several copies, or if additional copies were thereafter made, and if any such copies
10 are not identical in all respects or are no longer identical by reason of subsequent notation or
11 modification of any kind whatsoever, including notes on the front or back, in the margins, or on
12 any of the pages thereof, then each such non-identical copy is a separate Document and must be
13 produced. When examples of categories or types of Documents are given in a particular Request
14 by use of phrases such as “including,” this shall always be interpreted as being for illustrative
15 purposes only (i.e., to be understood as “including without limitation”) and in no way limits or
16 narrows the scope of any Request. “Documents” always includes Communications, whether so
17 stated in a particular Request or not.

18 8. The term “**Fire Victim Trust**” shall have the same meaning as that term is used in
19 the Chapter 11 Plan.

20 9. The term “**Fires**” shall have the same meaning as that term is used in the Chapter 11
21 Plan.

22 10. The term “**Insured Fire Victim**” shall mean a person or entity covered by insurance
23 who suffered a loss arising from one of the Fires and filed a Proof of Claim in the Chapter 11 Cases
24 on or before December 31, 2019.

25 11. The term “**Subrogation Wildfire Claim**” shall have the same meaning as that term
26 is used in the Chapter 11 Plan.

27 12. The term “**You**” and/or “**Your**” means Titan Insurance Company.
28

INSTRUCTIONS

1. These Requests are continuing in nature, so as to require supplemental responses and productions if further documents are identified, or information is obtained, between the time answers are served and the time the Fire Victim Trust is terminated.

2. Produce all Documents and all other materials described below in Your actual or constructive possession, custody, or control, including in the possession, custody, or control of current or former employees, officers, directors, agents, agents' representatives, consultants, contractors, vendors, or any fiduciary or other third parties, wherever those Documents and materials are maintained, including on personal computers, PDAs, wireless devices, or web-based email systems such as Gmail, Yahoo, etc.

3. You must produce all Documents in Your possession, custody, or control, whether maintained in electronic or paper form and whether located on hardware owned and maintained by You or hardware owned and/or maintained by a third party that stores data on Your behalf. You must produce all such Documents even if they were deleted or in draft form. Without limitation, hardware where such data may be stored includes: servers; desktop, laptop, or tablet computers; cell and smart phones; PDA devices; scanners, fax machines, and copying machines; and mobile storage devices, such as thumb or external hard drives. Electronically stored Documents include any computerized data or content stored on electromagnetic media. Without limitation, types of electronically stored Documents include email, voicemail, instant messages, intranet and internet system data, telephone and cellular telephone calling records, data compilations, spreadsheets, word processing Documents, images, databases, digital photocopier memory, and any other information stored in memory storage devices.

4. Produce the original or duplicate, as such terms are defined by Rule 1001 of the Federal Rules of Evidence, of each Document requested together with all non-identical copies and drafts of that Document. If a duplicate is produced, it should be legible and bound or stapled in the same manner as the original.

5. Documents not otherwise responsive to these Requests should be produced: (i) if such Documents mention, discuss, refer to, explain, or concern one or more Documents that are

1 called for by these Requests; (ii) if such Documents are attached to, enclosed with, or accompany
2 Documents called for by these Requests; or (iii) if such Documents constitute routing slips,
3 transmittal memoranda or letters, comments, evaluations, or similar materials.

4 6. Documents attached to each other should not be separated; separate Documents
5 should not be attached to each other.

6 7. Documents should include all exhibits, appendices, linked Documents, or otherwise
7 appended Documents that are referenced in, attached to, included with, or are a part of the
8 requested Documents.

9 8. If any Document, or any part thereof, is not produced based on a claim of attorney-
10 client privilege, work-product protection, or any other privilege, then in answer to such Request or
11 part thereof, for each such Document, You must:

- 12 a. Identify the type, title and subject matter of the Document;
- 13 b. State the place, date, and manner of preparation of the Document;
- 14 c. Identify all authors, addressees, and recipients of the Document, including
15 information about such persons to assess the privilege asserted; and
- 16 d. Identify the legal privilege(s) and the factual basis for the claim.

17 9. Documents should not contain redactions unless such redactions are made to protect
18 information subject to the attorney-client privilege and/or work-product doctrine. In the event any
19 Documents are produced with redactions, a log setting forth the information requested in
20 Instruction 8 above must be provided.

21 10. To the extent a Document sought herein was at one time, but is no longer, in Your
22 actual or constructive possession, custody, or control, state whether it: (i) is missing or lost; (ii) has
23 been destroyed; (iii) has been transferred to others; and/or (iv) has been otherwise disposed of. In
24 each instance, identify the Document, state the time period during which it was maintained, state
25 the circumstance and date surrounding authorization for such disposition, identify each person
26 having knowledge of the circumstances of the disposition, and identify each person who had
27 possession, custody, or control of the Document. Documents prepared prior to, but which relate or
28 refer to, the time period covered by these Requests are to be identified and produced.

1 11. Provide a privilege log relating to Your responses to each of these Requests which
2 You are withholding on the basis of privilege. The privilege log must list the Document or
3 information withheld and the legal basis for withholding that information.

4 12. Unless otherwise specified, the time period covered by these Requests for
5 Production is from September 9, 2015 to the present.

6 **MANNER OF PRODUCTION**

7 1. All Documents produced to the Fire Victim Trust shall be provided in either native
8 file (“native”) or single-page 300 dpi-resolution group IV TIF format (“tiff”) format as specified
9 below, along with appropriately formatted industry-standard database load files and accompanied
10 by true and correct copies or representations of unaltered attendant metadata. Where Documents
11 are produced in tiff format, each Document shall be produced along with a multi-page, Document-
12 level searchable text file (“searchable text”) as rendered by an industry-standard text extraction
13 program in the case of electronic originals, or by an industry-standard Optical Character
14 Recognition (“ocr”) program in the case of scanned paper Documents. Searchable text of
15 Documents shall not be produced as fielded data within the “.dat file” as described below.

16 2. Database Load Files and Production Media Structure: Database load files shall
17 consist of: (i) a comma-delimited values (“.dat”) file containing: production Document identifier
18 information, data designed to preserve “parent and child” relationships within Document
19 “families,” reasonably accessible and properly preserved metadata (or bibliographic coding in the
20 case of paper Documents), custodian or Document source information; and (ii) an Opticon (“.opt”)
21 file to facilitate the loading of tiff images. Load files should be provided in a root-level folder
22 named “Data,” images shall be provided within a root level “Images” folder containing reasonably
23 structured subfolders, and searchable text files shall be provided in a single root-level “Text”
24 folder.

25 3. Electronic Documents and Data, Generally: Documents and other responsive data
26 or materials created, stored, or displayed on electronic or electro-magnetic media shall be produced
27 in the order in which the Documents are or were stored in the ordinary course of business,
28 including all reasonably accessible metadata, custodian or Document source information, and

1 searchable text as to allow the Fire Victim Trust, through a reasonable and modest effort, to fairly,
2 accurately, and completely access, search, display, comprehend, and assess the Documents' true
3 and original content.

4 4. Emails and Attachments, and Other Email Account-Related Documents: All
5 Documents and accompanying metadata created and/or stored in the ordinary course of business
6 within commercial, off-the-shelf email systems including but not limited to Microsoft Exchange™,
7 Lotus Notes™, or Novell Groupwise™ shall be produced in tiff format, accompanying metadata,
8 and searchable text files or, alternately, in a format that fairly, accurately, and completely
9 represents each Document in such a manner as to make the Document(s) reasonably useable,
10 manageable, and comprehensible by the Fire Victim Trust.

11 5. Documents and Data Created or Stored in or by Structured Electronic Databases:
12 With the exclusion of email and email account-related Documents and data, all Documents and
13 accompanying metadata created and/or stored in structured electronic databases or files shall be
14 produced in a format that enables the Fire Victim Trust to reasonably manage and import those
15 Documents into a useable, coherent database. Documents must be accompanied by reasonably
16 detailed documentation explaining the Documents' content and format including but not limited to
17 data dictionaries and diagrams. Some acceptable formats, if and only if provided with definitive
18 file(s), table(s), and field level schemas include:

- 19 a. XML format file(s);
- 20 b. Microsoft SQL database(s);
- 21 c. Access database(s); and/or
- 22 d. fixed or variable length ASCII delimited files.

23 6. Spreadsheets, Multimedia, and Non-Standard File Types: All Documents generated
24 or stored in software such as Microsoft Excel or other commercially available spreadsheet
25 programs, as well as any multimedia files such as audio or video, shall be produced in their native
26 format, along with an accompanying placeholder image in tiff format indicating a native file has
27 been produced. A "Nativelink" entry shall be included in the .dat load file indicating the relative
28 file path to each native file on the production media. To the extent You have other file types that

do not readily or easily and accurately convert to tiff and searchable text, You may elect to produce those files in native format subject to the other requirements listed herein. Native files may be produced within a separate root-level folder structure on deliverable media entitled "Natives."

7. "Other" Electronic Documents: All other Documents and accompanying metadata and embedded data created or stored in unstructured files generated by commercially available software systems (excluding emails, structured electronic databases, spreadsheets, or multimedia) such as, but not limited to, word processing files (such as Microsoft Word), image files (such as Adobe .pdf files and other formats), and text files shall be produced in tiff and searchable text format in the order the files are or were stored in the ordinary course of business.

8. Paper Documents: Documents originally created or stored on paper shall be produced in tiff format. Relationships between Documents shall be identified within the Relativity .dat file utilizing document identifier numbers to express parent Document/child attachment boundaries, folder boundaries, and other groupings. In addition, the searchable text of each Document shall be provided as a multi-page text file as provided for by these Requests for Production.

DOCUMENT REQUESTS

REQUEST NUMBER 1:

Claim Files for all Insured Fire Victims.

REQUEST NUMBER 2:

Claim-Related Documents for all Insured Fire Victims.

REQUEST NUMBER 3:

Documents that record, reflect, or show payments made to Insured Fire Victims.

REQUEST NUMBER 4:

Documents that record, reflect, or show reserves for future payments and policy limits for Insured Fire Victims.

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EXHIBIT C

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Hamilton Managing General Agency Americas LLC, 1001Brickell Bay Dr., Suite 2208, Miami, FL 33131, C/O Corporation Service Company which will do business in California as CSC-Lawyers Incorporating Service, 2710 Gateway Oaks Drive, Suite 150N, Sacramento CA 95833

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: **See attached Exhibit 1.**

Place: United Reporter
66 West Flagler Street, Suite 300
Miami, FL 33130

Date and Time:
December 23, 2020 at 9am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached — Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: December 4, 2020 *CLERK OF COURT*

OR

Signature of Clerk or Deputy Clerk

/s/Joel S. Miliband

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing the PG&E Fire Victim Trustee, who issues or requests this subpoena, are:
Joel S. Miliband, Brown Rudnick LLP, 2211 Michelson Drive, Seventh Floor, Irvine, California 92612,
JMiliband@brownrudnick.com

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Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Bankruptcy Case
No. 19-30088 (DM)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any) _____

on (date) _____.

☐ I served the subpoena by delivering a copy to the name person as follows: _____

_____ on (date) _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

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(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

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24 7. The term “**Documents**” shall mean any writings, recordings, electronic files and
25 mails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001
26 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents
27 and information in Your possession, custody, or control, and includes: all and any written,
28 recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda,

1 transcripts, tapes, or other voice recordings, and all other documents and tangible things, including
2 booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts,
3 agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files,
4 interoffice memoranda, or interoffice communications of any description, calculations, invoices,
5 accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails,
6 phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes,
7 letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and
8 all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document
9 was prepared in several copies, or if additional copies were thereafter made, and if any such copies
10 are not identical in all respects or are no longer identical by reason of subsequent notation or
11 modification of any kind whatsoever, including notes on the front or back, in the margins, or on
12 any of the pages thereof, then each such non-identical copy is a separate Document and must be
13 produced. When examples of categories or types of Documents are given in a particular Request
14 by use of phrases such as “including,” this shall always be interpreted as being for illustrative
15 purposes only (i.e., to be understood as “including without limitation”) and in no way limits or
16 narrows the scope of any Request. “Documents” always includes Communications, whether so
17 stated in a particular Request or not.

18 8. The term “**Fire Victim Trust**” shall have the same meaning as that term is used in
19 the Chapter 11 Plan.

20 9. The term “**Fires**” shall have the same meaning as that term is used in the Chapter 11
21 Plan.

22 10. The term “**Insured Fire Victim**” shall mean a person or entity covered by insurance
23 who suffered a loss arising from one of the Fires and filed a Proof of Claim in the Chapter 11 Cases
24 on or before December 31, 2019.

25 11. The term “**Subrogation Wildfire Claim**” shall have the same meaning as that term
26 is used in the Chapter 11 Plan.

27 12. The term “**You**” and/or “**Your**” means Hamilton Managing General Agency
28 Americas LLC.

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2. Produce all Documents and all other materials described below in Your actual or constructive possession, custody, or control, including in the possession, custody, or control of current or former employees, officers, directors, agents, agents' representatives, consultants, contractors, vendors, or any fiduciary or other third parties, wherever those Documents and materials are maintained, including on personal computers, PDAs, wireless devices, or web-based email systems such as Gmail, Yahoo, etc.

4. Produce the original or duplicate, as such terms are defined by Rule 1001 of the Federal Rules of Evidence, of each Document requested together with all non-identical copies and drafts of that Document. If a duplicate is produced, it should be legible and bound or stapled in the same manner as the original.

5. Documents not otherwise responsive to these Requests should be produced: (i) if such Documents mention, discuss, refer to, explain, or concern one or more Documents that are

1 called for by these Requests; (ii) if such Documents are attached to, enclosed with, or accompany
2 Documents called for by these Requests; or (iii) if such Documents constitute routing slips,
3 transmittal memoranda or letters, comments, evaluations, or similar materials.

4 6. Documents attached to each other should not be separated; separate Documents
5 should not be attached to each other.

6 7. Documents should include all exhibits, appendices, linked Documents, or otherwise
7 appended Documents that are referenced in, attached to, included with, or are a part of the
8 requested Documents.

9 8. If any Document, or any part thereof, is not produced based on a claim of attorney-
10 client privilege, work-product protection, or any other privilege, then in answer to such Request or
11 part thereof, for each such Document, You must:

- 12 a. Identify the type, title and subject matter of the Document;
- 13 b. State the place, date, and manner of preparation of the Document;
- 14 c. Identify all authors, addressees, and recipients of the Document, including
15 information about such persons to assess the privilege asserted; and
- 16 d. Identify the legal privilege(s) and the factual basis for the claim.

17 9. Documents should not contain redactions unless such redactions are made to protect
18 information subject to the attorney-client privilege and/or work-product doctrine. In the event any
19 Documents are produced with redactions, a log setting forth the information requested in
20 Instruction 8 above must be provided.

21 10. To the extent a Document sought herein was at one time, but is no longer, in Your
22 actual or constructive possession, custody, or control, state whether it: (i) is missing or lost; (ii) has
23 been destroyed; (iii) has been transferred to others; and/or (iv) has been otherwise disposed of. In
24 each instance, identify the Document, state the time period during which it was maintained, state
25 the circumstance and date surrounding authorization for such disposition, identify each person
26 having knowledge of the circumstances of the disposition, and identify each person who had
27 possession, custody, or control of the Document. Documents prepared prior to, but which relate or
28 refer to, the time period covered by these Requests are to be identified and produced.

1 11. Provide a privilege log relating to Your responses to each of these Requests which
2 You are withholding on the basis of privilege. The privilege log must list the Document or
3 information withheld and the legal basis for withholding that information.

4 12. Unless otherwise specified, the time period covered by these Requests for
5 Production is from September 9, 2015 to the present.

6 **MANNER OF PRODUCTION**

7 9. All Documents produced to the Fire Victim Trust shall be provided in either native
8 file (“native”) or single-page 300 dpi-resolution group IV TIF format (“tiff”) format as specified
9 below, along with appropriately formatted industry-standard database load files and accompanied
10 by true and correct copies or representations of unaltered attendant metadata. Where Documents
11 are produced in tiff format, each Document shall be produced along with a multi-page, Document-
12 level searchable text file (“searchable text”) as rendered by an industry-standard text extraction
13 program in the case of electronic originals, or by an industry-standard Optical Character
14 Recognition (“ocr”) program in the case of scanned paper Documents. Searchable text of
15 Documents shall not be produced as fielded data within the “.dat file” as described below.

16 10. Database Load Files and Production Media Structure: Database load files shall
17 consist of: (i) a comma-delimited values (“.dat”) file containing: production Document identifier
18 information, data designed to preserve “parent and child” relationships within Document
19 “families,” reasonably accessible and properly preserved metadata (or bibliographic coding in the
20 case of paper Documents), custodian or Document source information; and (ii) an Opticon (“.opt”)
21 file to facilitate the loading of tiff images. Load files should be provided in a root-level folder
22 named “Data,” images shall be provided within a root level “Images” folder containing reasonably
23 structured subfolders, and searchable text files shall be provided in a single root-level “Text”
24 folder.

25 11. Electronic Documents and Data, Generally: Documents and other responsive data
26 or materials created, stored, or displayed on electronic or electro-magnetic media shall be produced
27 in the order in which the Documents are or were stored in the ordinary course of business,
28 including all reasonably accessible metadata, custodian or Document source information, and

1 searchable text as to allow the Fire Victim Trust, through a reasonable and modest effort, to fairly,
2 accurately, and completely access, search, display, comprehend, and assess the Documents' true
3 and original content.

4 12. Emails and Attachments, and Other Email Account-Related Documents: All
5 Documents and accompanying metadata created and/or stored in the ordinary course of business
6 within commercial, off-the-shelf email systems including but not limited to Microsoft Exchange™,
7 Lotus Notes™, or Novell Groupwise™ shall be produced in tiff format, accompanying metadata,
8 and searchable text files or, alternately, in a format that fairly, accurately, and completely
9 represents each Document in such a manner as to make the Document(s) reasonably useable,
10 manageable, and comprehensible by the Fire Victim Trust.

11 13. Documents and Data Created or Stored in or by Structured Electronic Databases:
12 With the exclusion of email and email account-related Documents and data, all Documents and
13 accompanying metadata created and/or stored in structured electronic databases or files shall be
14 produced in a format that enables the Fire Victim Trust to reasonably manage and import those
15 Documents into a useable, coherent database. Documents must be accompanied by reasonably
16 detailed documentation explaining the Documents' content and format including but not limited to
17 data dictionaries and diagrams. Some acceptable formats, if and only if provided with definitive
18 file(s), table(s), and field level schemas include:

- 19 a. XML format file(s);
- 20 b. Microsoft SQL database(s);
- 21 c. Access database(s); and/or
- 22 d. fixed or variable length ASCII delimited files.

23 14. Spreadsheets, Multimedia, and Non-Standard File Types: All Documents generated
24 or stored in software such as Microsoft Excel or other commercially available spreadsheet
25 programs, as well as any multimedia files such as audio or video, shall be produced in their native
26 format, along with an accompanying placeholder image in tiff format indicating a native file has
27 been produced. A "Nativelink" entry shall be included in the .dat load file indicating the relative
28 file path to each native file on the production media. To the extent You have other file types that

1 do not readily or easily and accurately convert to tiff and searchable text, You may elect to produce
2 those files in native format subject to the other requirements listed herein. Native files may be
3 produced within a separate root-level folder structure on deliverable media entitled "Natives."

4 15. "Other" Electronic Documents: All other Documents and accompanying metadata
5 and embedded data created or stored in unstructured files generated by commercially available
6 software systems (excluding emails, structured electronic databases, spreadsheets, or multimedia)
7 such as, but not limited to, word processing files (such as Microsoft Word), image files (such as
8 Adobe .pdf files and other formats), and text files shall be produced in tiff and searchable text
9 format in the order the files are or were stored in the ordinary course of business.

10 16. Paper Documents: Documents originally created or stored on paper shall be
11 produced in tiff format. Relationships between Documents shall be identified within the Relativity
12 .dat file utilizing document identifier numbers to express parent Document/child attachment
13 boundaries, folder boundaries, and other groupings. In addition, the searchable text of each
14 Document shall be provided as a multi-page text file as provided for by these Requests for
15 Production.

16 DOCUMENT REQUESTS

17 **REQUEST NUMBER 1:**

18 Claim Files for all Insured Fire Victims.
19

20 **REQUEST NUMBER 2:**

21 Claim-Related Documents for all Insured Fire Victims.
22

23 **REQUEST NUMBER 3:**

24 Documents that record, reflect, or show payments made to Insured Fire Victims.
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26 **REQUEST NUMBER 4:**

27 Documents that record, reflect, or show reserves for future payments and policy limits for
28 Insured Fire Victims.

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EXHIBIT D

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 In re:

4 PG&E CORPORATION

5 -and-

6 PACIFIC GAS AND ELECTRIC
7 COMPANY,

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

8 SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
9 OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

10 To: Freedom Specialty Insurance Company, One West Nationwide Blvd, Columbus, OH 43215
11 C/O Corporation Service Company which will do business in California as CSC – Lawyers Incorporating
12 Service (C1592199), 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833

(Name of person to whom this subpoena is directed)

- 13 ☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the
14 following documents, electronically stored information, or objects, and to permit inspection,
15 copying, testing, or sampling of the material: *See attached Exhibit 1.*

16 Place: Mike Mobley Reporting
17 200 E Campus View Boulevard Suite 200
18 Columbus, OH 43235

Date and Time:
December 23, 2020 at 9am

- 19 ☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises,
20 land, or other property possessed or controlled by you at the time, date, and location set forth below,
21 so that the requesting party may inspect, measure, survey, photograph, test, or sample the property
22 or any designated object or operation on it.

23 Place:

Date and Time:

24 The following provisions of Fed. R. Civ. P. 45 are attached — Rule 45(c), relating to the place of
25 compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and
26 (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

27 Date: December 4, 2020 CLERK OF COURT

OR

28 _____
Signature of Clerk or Deputy Clerk

/s/Joel s. Miliband
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing the PG&E Fire
Victim Trustee, who issues or requests this subpoena, are:

Joel S. Miliband, Brown Rudnick LLP, 2211 Michelson Drive, Seventh Floor, Irvine, California 92612,
JMiliband@brownrudnick.com

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Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Bankruptcy Case
No. 19-30088 (DM)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (*name of individual and title, if any*) _____

on (*date*) _____.

☐ I served the subpoena by delivering a copy to the name person as follows: _____

_____ on (*date*) _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) **For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) **For Other Discovery.** A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) **Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) **Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) **Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) **When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) **When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) **Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information.

These procedures apply to producing documents or electronically stored information:

(A) **Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) **Form for Producing Electronically Stored Information Not Specified.**

If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) **Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

(D) **Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) **Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) **Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

1 **EXHIBIT 1**

2 **DEFINITIONS**

3 1. The term “**Bankruptcy Court**” shall mean the United States Bankruptcy Court for
4 the Northern District of California.

5 2. The term “**Chapter 11 Cases**” shall mean the chapter 11 cases commenced by
6 PG&E Corporation and Pacific Gas and Electric Company in the Bankruptcy Court, Case
7 No. 19-30088.

8 3. The term “**Chapter 11 Plan**” shall mean the Debtors’ and Shareholder Proponents’
9 Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket No. 8048] confirmed by
10 order of the Bankruptcy Court in the Chapter 11 Cases.

11 4. The term “**Claim Files**” shall mean claim files containing information relating to
12 insurance coverage, policy limits, insurance claims, reserves, and insurance payments, including,
13 but not limited to, insurance policies, statements of loss, and policy declarations.

14 5. The term “**Claim-Related Documents**” means all documents that relate to the
15 evaluation of damages, including, but not limited to, repair and replacement estimates and bids,
16 appraisals, scopes of loss, drawings, plans, reports, third-party findings on the amount of loss,
17 covered damages, and cost of repairs, and all other valuation, measurement, and loss adjustment
18 calculations of the amount of loss, covered damage, and cost of repairs.

19 6. The term “**Communications**” shall mean all inquiries, discussions, conversations,
20 negotiations, agreements, understandings, meetings, telephone conversations, letters, notes,
21 telegrams, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal,
22 written, mechanical, or electronic disclosure, in Your actual or constructive control or custody or in
23 the control or custody of any current or former affiliates, representatives or advisors.

24 7. The term “**Documents**” shall mean any writings, recordings, electronic files and
25 mails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001
26 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents
27 and information in Your possession, custody, or control, and includes: all and any written,
28 recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda,

1 transcripts, tapes, or other voice recordings, and all other documents and tangible things, including
2 booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts,
3 agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files,
4 interoffice memoranda, or interoffice communications of any description, calculations, invoices,
5 accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails,
6 phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes,
7 letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and
8 all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document
9 was prepared in several copies, or if additional copies were thereafter made, and if any such copies
10 are not identical in all respects or are no longer identical by reason of subsequent notation or
11 modification of any kind whatsoever, including notes on the front or back, in the margins, or on
12 any of the pages thereof, then each such non-identical copy is a separate Document and must be
13 produced. When examples of categories or types of Documents are given in a particular Request
14 by use of phrases such as “including,” this shall always be interpreted as being for illustrative
15 purposes only (i.e., to be understood as “including without limitation”) and in no way limits or
16 narrows the scope of any Request. “Documents” always includes Communications, whether so
17 stated in a particular Request or not.

18 8. The term “**Fire Victim Trust**” shall have the same meaning as that term is used in
19 the Chapter 11 Plan.

20 9. The term “**Fires**” shall have the same meaning as that term is used in the Chapter 11
21 Plan.

22 10. The term “**Insured Fire Victim**” shall mean a person or entity covered by insurance
23 who suffered a loss arising from one of the Fires and filed a Proof of Claim in the Chapter 11 Cases
24 on or before December 31, 2019.

25 11. The term “**Subrogation Wildfire Claim**” shall have the same meaning as that term
26 is used in the Chapter 11 Plan.

27 12. The term “**You**” and/or “**Your**” means Freedom Specialty Insurance Company.
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1 called for by these Requests; (ii) if such Documents are attached to, enclosed with, or accompany
2 Documents called for by these Requests; or (iii) if such Documents constitute routing slips,
3 transmittal memoranda or letters, comments, evaluations, or similar materials.

4 18. Documents attached to each other should not be separated; separate Documents
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7 appended Documents that are referenced in, attached to, included with, or are a part of the
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9 20. If any Document, or any part thereof, is not produced based on a claim of attorney-
10 client privilege, work-product protection, or any other privilege, then in answer to such Request or
11 part thereof, for each such Document, You must:

- 12 a. Identify the type, title and subject matter of the Document;
- 13 b. State the place, date, and manner of preparation of the Document;
- 14 c. Identify all authors, addressees, and recipients of the Document, including
15 information about such persons to assess the privilege asserted; and
- 16 d. Identify the legal privilege(s) and the factual basis for the claim.

17 21. Documents should not contain redactions unless such redactions are made to protect
18 information subject to the attorney-client privilege and/or work-product doctrine. In the event any
19 Documents are produced with redactions, a log setting forth the information requested in
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21 22. To the extent a Document sought herein was at one time, but is no longer, in Your
22 actual or constructive possession, custody, or control, state whether it: (i) is missing or lost; (ii) has
23 been destroyed; (iii) has been transferred to others; and/or (iv) has been otherwise disposed of. In
24 each instance, identify the Document, state the time period during which it was maintained, state
25 the circumstance and date surrounding authorization for such disposition, identify each person
26 having knowledge of the circumstances of the disposition, and identify each person who had
27 possession, custody, or control of the Document. Documents prepared prior to, but which relate or
28 refer to, the time period covered by these Requests are to be identified and produced.

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2 You are withholding on the basis of privilege. The privilege log must list the Document or
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5 Production is from September 9, 2015 to the present.

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7 17. All Documents produced to the Fire Victim Trust shall be provided in either native
8 file (“native”) or single-page 300 dpi-resolution group IV TIF format (“tiff”) format as specified
9 below, along with appropriately formatted industry-standard database load files and accompanied
10 by true and correct copies or representations of unaltered attendant metadata. Where Documents
11 are produced in tiff format, each Document shall be produced along with a multi-page, Document-
12 level searchable text file (“searchable text”) as rendered by an industry-standard text extraction
13 program in the case of electronic originals, or by an industry-standard Optical Character
14 Recognition (“ocr”) program in the case of scanned paper Documents. Searchable text of
15 Documents shall not be produced as fielded data within the “.dat file” as described below.

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21 file to facilitate the loading of tiff images. Load files should be provided in a root-level folder
22 named “Data,” images shall be provided within a root level “Images” folder containing reasonably
23 structured subfolders, and searchable text files shall be provided in a single root-level “Text”
24 folder.

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1 searchable text as to allow the Fire Victim Trust, through a reasonable and modest effort, to fairly,
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9 represents each Document in such a manner as to make the Document(s) reasonably useable,
10 manageable, and comprehensible by the Fire Victim Trust.

11 21. Documents and Data Created or Stored in or by Structured Electronic Databases:
12 With the exclusion of email and email account-related Documents and data, all Documents and
13 accompanying metadata created and/or stored in structured electronic databases or files shall be
14 produced in a format that enables the Fire Victim Trust to reasonably manage and import those
15 Documents into a useable, coherent database. Documents must be accompanied by reasonably
16 detailed documentation explaining the Documents' content and format including but not limited to
17 data dictionaries and diagrams. Some acceptable formats, if and only if provided with definitive
18 file(s), table(s), and field level schemas include:

- 19 a. XML format file(s);
- 20 b. Microsoft SQL database(s);
- 21 c. Access database(s); and/or
- 22 d. fixed or variable length ASCII delimited files.

23 22. Spreadsheets, Multimedia, and Non-Standard File Types: All Documents generated
24 or stored in software such as Microsoft Excel or other commercially available spreadsheet
25 programs, as well as any multimedia files such as audio or video, shall be produced in their native
26 format, along with an accompanying placeholder image in tiff format indicating a native file has
27 been produced. A "Nativelink" entry shall be included in the .dat load file indicating the relative
28 file path to each native file on the production media. To the extent You have other file types that

1 do not readily or easily and accurately convert to tiff and searchable text, You may elect to produce
2 those files in native format subject to the other requirements listed herein. Native files may be
3 produced within a separate root-level folder structure on deliverable media entitled "Natives."

4 23. "Other" Electronic Documents: All other Documents and accompanying metadata
5 and embedded data created or stored in unstructured files generated by commercially available
6 software systems (excluding emails, structured electronic databases, spreadsheets, or multimedia)
7 such as, but not limited to, word processing files (such as Microsoft Word), image files (such as
8 Adobe .pdf files and other formats), and text files shall be produced in tiff and searchable text
9 format in the order the files are or were stored in the ordinary course of business.

10 24. Paper Documents: Documents originally created or stored on paper shall be
11 produced in tiff format. Relationships between Documents shall be identified within the Relativity
12 .dat file utilizing document identifier numbers to express parent Document/child attachment
13 boundaries, folder boundaries, and other groupings. In addition, the searchable text of each
14 Document shall be provided as a multi-page text file as provided for by these Requests for
15 Production.

16 **DOCUMENT REQUESTS**

17 **REQUEST NUMBER 1:**

18 Claim Files for all Insured Fire Victims.
19

20 **REQUEST NUMBER 2:**

21 Claim-Related Documents for all Insured Fire Victims.
22

23 **REQUEST NUMBER 3:**

24 Documents that record, reflect, or show payments made to Insured Fire Victims.
25

26 **REQUEST NUMBER 4:**

27 Documents that record, reflect, or show reserves for future payments and policy limits for
28 Insured Fire Victims.